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**From:** Riaz Zaman [rzaman@paint.org]  
**Sent:** 2/13/2020 5:10:28 PM  
**To:** Corado, Ana [Corado.Ana@epa.gov]; Barone, Stan [Barone.Stan@epa.gov]  
**CC:** Peterson, Todd [Peterson.Todd@epa.gov]; Wolf, Joel [Wolf.Joel@epa.gov]  
**Subject:** RE: Supplemental Data to EPA's Draft Risk Evaluation for NMP - re: paints, coatings, sealants and adhesives

Dear Dr. Corado:

Thank you for your response. I am attempting to gather additional information from my members that I hope to submit by the end of February. Regarding the type of information, in my view, EPA needs data regarding emissions during loading / unloading and worker exposure times. In lieu of actual emissions data, concentration amounts of NMP in raw materials might yield more accurate results in EPA testing models (currently, concentration amounts are over-estimated based on ranges reported under CDR). This of course is my assessment. Please let me know if you have any comment on the type of data that would be helpful.

Thanks for explaining the process regarding late submissions. I hope we can provide information that is useful.

Best wishes,

**Riaz Zaman** • American Coatings Association • Counsel, Government Affairs  
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**From:** Corado, Ana <Corado.Ana@epa.gov>  
**Sent:** Wednesday, February 12, 2020 5:46 PM  
**To:** Riaz Zaman <rzaman@paint.org>; Barone, Stan <Barone.Stan@epa.gov>  
**Cc:** Peterson, Todd <Peterson.Todd@epa.gov>; Wolf, Joel <Wolf.Joel@epa.gov>  
**Subject:** RE: Supplemental Data to EPA's Draft Risk Evaluation for NMP - re: paints, coatings, sealants and adhesives

Dear Mr. Riaz Zaman,

Thank you very much for your interest in providing additional information regarding the NMP risk evaluation.

As you are aware, the comment period for the draft risk evaluation has closed. The only way to receive information is if we process your submission as a late public comment. Do you know when you'll be able to send the additional information?

We would be interested in obtaining more information regarding the conditions of use of NMP and, as you mentioned, information that would allow us to use monitoring data for the exposure scenarios of the risk evaluation. Since you don't provide much information regarding the type of information you will be able to submit or when we can expect to receive the information, it is difficult to confirm how the information will be considered in the final risk evaluation, given the deadlines set by TSCA for the completion of the risk evaluation.

Please follow the instructions below to send the late public comment to the NMP docket.

Best Regards,

Ana Corado

Instructions on how to submit late public comments to the docket: EPA-HQ-OPPT-2016-0743.

Please confirm that the document does not contain any confidential business information or CBI. If the document contains CBI, then please include a redacted public version of the document and the necessary information to substantiate that the information is CBI. The package has to be sent to the Confidential Business Information Center even if it does not contain CBI.

Please include a cover letter, preferably on company letterhead, with a date and the docket number: EPA-HQ-OPPT-2016-0743 (N-Methylpyrrolidone; TSCA Review and Risk Evaluation).

**For mailing:**

OPPT Document Control Office (7407M)  
Docket: EPA-HQ-OPPT-2016-0743  
Att: Ana Corado  
Confidential Business Information Center  
U.S. EPA  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460-0001

**For hand delivery or currier (such as Fedex):**

Confidential Business Information Center (7407M)  
1201 Constitution Ave., N.W.  
WJ Clinton East Building, Room 6428  
Docket: EPA-HQ-OPPT-2016-0743  
Att: Ana Corado

Please note that this is the 1201 Constitution Avenue, NW entrance  
When you arrive, please phone (202) 564-8930 to have someone come down and receive the package  
Deliveries accepted from 8:30 am to 4:00 pm

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**From:** Riaz Zaman <[rzaman@paint.org](mailto:rzaman@paint.org)>  
**Sent:** Monday, February 03, 2020 4:16 PM  
**To:** Corado, Ana <[Corado.Ana@epa.gov](mailto:Corado.Ana@epa.gov)>; Barone, Stan <[Barone.Stan@epa.gov](mailto:Barone.Stan@epa.gov)>  
**Cc:** Peterson, Todd <[Peterson.Todd@epa.gov](mailto:Peterson.Todd@epa.gov)>  
**Subject:** Supplemental Data to EPA's Draft Risk Evaluation for NMP - re: paints, coatings, sealants and adhesives

Dear Dr. Corado and Dr. Barone,

My name is Riaz Zaman, and I am counsel with ACA (American Coatings Association). As noted in our comment on the draft risk evaluation for NMP, EPA issued a finding of unreasonable risk for several uses of interest, based on

conservative assumptions while lacking relevant data. If still possible, I would like to collect and submit additional data to EPA, from ACA members, assuming data is available. To that end and assuming its not too late to submit data, could I speak with you or someone on your staff at your earliest convenience about data needs?

For example, under the condition of use, *incorporation into formulation*, should ACA submit monitoring data with air emissions concentrations during loading and unloading, if such data is available? Or, rather, should ACA submit typical concentrations for common NMP-containing raw materials? For this use, EPA's risk evaluation is based on high-end concentrations from ranges manufacturers reported in the CDR.

Similarly, for other relevant conditions of use, EPA assumes 8 hours of exposure. Should ACA submit data of actual worker exposure times for these conditions of use?

I am attaching a copy of our comment as filed with EPA for your reference. Thank you for considering this request. I look forward to your advice on this matter.

Sincerely,

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